

### **REMARKS**

At the outset, the Examiner is thanked for the thorough review and consideration of the subject application. The Non-Final Office Action of June 5, 2003 has been received and its contents carefully reviewed.

In the Office Action, the Examiner rejected claims 1-12 under 35 U.S.C. § 103(a) as being unpatentable over Ha et al. (U.S. Pat. App. Pub. No. 2002/0186333) in view of Korzen (U.S. Pat. No. 5,699,039) and Sasuga et al. (U.S. Pat. No. 6,466,282) and rejected claims 13-19 under 35 U.S.C. § 103(a) as being unpatentable over Kim (U.S. Pat. No. 6,330,150) in view of Shimada et al. (U.S. Pat. No. 6,020,867) and Ueda et al. (U.S. Pat. No. 5,838,412). The rejections of the claims is traversed and reconsideration of the claims is respectfully requested in view of the following remarks.

Preliminarily, Applicants note that Ha et al. (U.S. Pat. App. Pub. No. 2002/0186333), Korzen (U.S. Pat. No. 5,699,039), and Ueda et al. (U.S. Pat. No. 5,838,412) were applied in rejections of the outstanding Office Action, part of Paper No. 4. However, Ha et al., Korzen, and Ueda et al. were not listed in the "Notice of References Cited" mailed with the outstanding Office Action. Accordingly, Applicants respectfully request the Examiner formally cite the Ha et al., Korzen, and Ueda et al. references within a "Notice of References Cited".

The rejection of claims 1-12 under 35 U.S.C. § 103(a) as being unpatentable over Ha et al. in view of Korzen and Sasuga et al. is respectfully traversed and reconsideration is requested.

To establish a *prima facie* case of obviousness, the references when combined must at least teach or suggest all the claim limitations. See MPEP § 2142. For the reasons set forth

below, Applicants respectfully submit a *prima facie* case of obviousness has not been established with regard to the presently claimed invention.

Claim 1 is allowable over the cited references in that claim 1 recites a combination of elements including, for example "an inverter...; a case...; and at least one bracket arranged on a bottom surface of the case for connecting the inverter to the case." None of the cited references, including Ha et al., Korzen, or Sasuga et al., singly or in combination, teaches or suggests at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claims 2-6, which depend from claim 1, are allowable over the cited references.

Claim 7 is allowable over the cited references in that claim 7 recites a combination of elements including, for example "a case...; and a bracket arranged on the case, wherein the bracket comprises: an inverter part; and a case part; wherein the inverter is arranged on the inverter part." None of the cited references, including Ha et al., Korzen, or Sasuga et al., singly or in combination, teaches or suggests at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claims 8 and 9, which depend from claim 7, are also allowable over the cited references.

Claim 10 is allowable over the cited references in that claim 10 recites a combination of elements including, for example "... a case...; a first and a second bracket arranged on the case; wherein the first bracket includes an inverter part and a case part; and wherein the inverter is arranged on the inverter part." None of the cited references, including Ha et al., Korzen, or Sasuga et al., singly or in combination, teaches or suggests at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claims 11 and 12, which depend from claim 10, are also allowable over the cited references.

The Examiner cites Ha et al. as failing "...to disclose the required inverter and the hole projection structures" and relies on Sasuga et al. to cure at least some of the deficiencies of Ha et al. More specifically, the Examiner cites Sasuga et al. as disclosing "the required hole projection structure." In concluding the rejection, the Examiner states it would have been obvious to "...include the required ...hole projection [structure] in Ha et al. as taught by ...Sasuga et al. in order to have a liquid crystal display device with better performance."

Applicants respectfully submit, however, the claimed invention does not require a "hole projection structure," as asserted by the Examiner. To reiterate, claim 1 requires, among other elements "at least one bracket arranged on a bottom surface of the case for connecting the inverter to the case," claim 7 requires, among other elements "a bracket arranged on the case, wherein the bracket comprises: an inverter part; and a case part; wherein the inverter is arranged on the inverter part," and claim 10 requires, among other elements "a first and a second bracket arranged on the case; wherein the first bracket includes an inverter part and a case part; and wherein the inverter is arranged on the inverter part."

Applicants respectfully submit Sasuga et al. teaches at column 23, lines 31-36, "[t]he inverter circuit IPCB is placed in the lower casing LCA, as shown in FIG. 37, and fixed through fixing holes IHL (as shown in FIGS. 34 to 36) of the lower casing LCA by means of the not shown fixing members such as nylon rivets." Applicants respectfully submit Sasuga et al. fails to teach at least the bracket structure included within the claimed invention.

Accordingly, Applicant respectfully submits that Ha et al. in view of Korzen and Sasuga et al., singly or in combination, does not teach or suggest at least the aforementioned combination of elements.

The rejection of 13-19 under 35 U.S.C. § 103(a) as being unpatentable over Kim in view of Shimada et al. and Ueda et al. is respectfully traversed and reconsideration is requested.

Claim 13 is allowable over the cited references in that claim 13 recites a combination of elements including, for example "an inverter; ... a case...; ...a bracket arranged on the case, wherein the bracket comprises: an inverter part; and a case part; wherein the inverter is arranged on the inverter part." None of the cited references, including Kim, Shimada et al., or Ueda et al., singly or in combination, teaches or suggests at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claim 14, which depends from claim 13, is also allowable over the cited references.

Claim 15 is allowable over the cited references in that claim 15 recites a combination of elements including, for example "... a case...; a first and a second bracket connected to the case; wherein the first bracket includes an inverter part and a case part; and wherein the inverter is attached to the inverter part." None of the cited references, including Kim, Shimada et al., or Ueda et al., singly or in combination, teaches or suggests at least these features of the claimed invention. Accordingly, Applicants respectfully submit that claims 16 and 17, which depend from claim 15, are also allowable over the cited references.

Claim 18 is allowable over the cited references in that claim 18 recites a combination of elements including, for example "an inverter; ... a case...; ...a bracket connected to the case, wherein the bracket comprises: an inverter part; and a case part; wherein the inverter is attached to the inverter part." None of the cited references, including Kim, Shimada et al., or Ueda et al., singly or in combination, teaches or suggests at least these features of the claimed

invention. Accordingly, Applicants respectfully submit that claim 19, which depends from claim 18, is also allowable over the cited references.

The Examiner cites Kim as failing "...to disclose the required inverter and the hole projection structures." The Examiner then attempts to cure the deficiencies of Kim by citing Shimada et al. as disclosing "the required inverter structure" and Ueda et al. as disclosing "a liquid crystal display device assembled by flip chip technology comprising a folded multi-layered flexible driving circuit assembly." In concluding the rejection, the Examiner states it would have been obvious to "...include the required inverter and hole projection structures in Kim as taught by Shimada et al., and Ueda et al. respectively in order to have a liquid crystal display device with better performance."

Firstly, Applicants respectfully submit, however, the claimed invention does not require "a liquid crystal display device assembled by flip chip technology comprising a folded multi-layered flexible driving circuit assembly," as implied by the Examiner. Secondly, Applicants respectfully submit the claimed invention does not require a "hole projection structure," as asserted by the Examiner. To reiterate, claim 13 requires, among other elements "a bracket arranged on the case, wherein the bracket comprises: an inverter part; and a case part; wherein the inverter is arranged on the inverter part," claim 15 requires, among other elements "a first and a second bracket connected to the case; wherein the first bracket includes an inverter part and a case part; and wherein the inverter is attached to the inverter part," and claim 18 requires, among other elements "a bracket connected to the case, wherein the bracket comprises: an inverter part; and a case part; wherein the inverter is attached to the inverter part."

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Group Art Unit: 2826  
Reply to Office Action of June 5, 2003

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Applicants respectfully submit Kim, Shimada et al., and Ueda et al. fail to teach or suggest at least the bracket structure included within the claimed invention. Accordingly, Applicant respectfully submits that Kim in view of Shimada et al. and Ueda et al., singly or in combination, teaches or suggests at least the aforementioned combination of elements.

Applicants believe the application in condition for allowance and early, favorable action is respectfully solicited. Should the Examiner deem that a telephone conference would further the prosecution of this application, the Examiner is invited to call the undersigned attorney at (202) 496-7500.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136. Please credit any overpayment to deposit Account No. 50-0911.

Respectfully submitted,

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Date: August 26, 2003

By



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